Commonwealth of Kentucky Division for Air Quality

PERMIT STATEMENT OF BASIS

Permit No. F-01-043 (Revision 2) Weyerhaeuser Company - Richwood Preprint Plant 380 Shorland Drive, Richwood, Kentucky 41094

APRIL 7, 2005
BRIAN BALLARD, REVIEWER
PLANT ID # 021-015-00106
ACTIVITY ID#: APE20050001
A.I. # 37270

CHANGES TO THE PERMIT (REVISION 2)

EP04, page 5 of F-01-043 (Revision 2)

This permitting action addresses the replacement of the existing flexographic plate equipment with new flexographic plate equipment. The capacity of the new equipment is 3,125 square inches of plate area processed per hour. The pollutant emitted from this process is VOC. The potential to emit (PTE) of VOC is determined by the maximum plate area processed per hour, the plating solvent consumption as gallons per square inch and 8,760 hours per year of operation.

COMMENTS:

The plating solvent consumption is determined by an analysis of the annual gallons of waste solvent shipped offsite from a comparable machine at a Weyerhaeuser facility in Beaverton, Oregon and that facility's annual consumption of square inches of plate material. This solvent consumption rate is applied to the new machine to be installed at the Richwood facility to determine PTE of VOC. There is no control equipment for this emission point.

APPLICABLE REGULATIONS:

This facility is exempt from the requirements of 401 KAR 59:212, Section 3(2) by meeting the condition of utilizing inks with an emission limit of five-tenths (0.5) lb VOC/lb solids as delivered to the applicator specified in 401 KAR 59:212, Section 6(4).

EMISSION AND OPERATING CAPS DESCRIPTION:

The actual VOC emissions shall not exceed 50.0 tons per year. These annual limitations shall not be exceeded during any consecutive twelve months period for the entire source.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has not incorporated these provisions in its air quality regulations.